

Town of Peru, Massachusetts



Americans With Disabilities Act

Self-Evaluation and Transition Plan



Prepared by:



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Introduction

The small Town of Peru, Massachusetts, encompassing 26.1 square miles, is located in central Berkshire County, along its eastern border. Peru's current population is approximately 823 (per Town Clerk data.) According to the U.S. Census Bureau, 2010-2014 American Communities Survey, approximately 128 (roughly 12%) of Peru's residents have a disability. Of the approximately 633 residents in the 18-64 age group, 77 residents (12%) have at least one disability, 14 residents (2.2 %) have a hearing difficulty, 20 residents (3.2 %) have a vision difficulty, 43 residents (6.8 %) have an ambulatory difficulty, 25 residents (3.9 %) have a self-care difficulty, and 46 residents (7.3 %) have difficulty living independently. In addition, 45 of the estimated 83 residents over the age of 65 (54%), also have a disability. Older adults over age 65, are typically the most active voter, program participant and volunteer in small, rural communities like Peru, making accessibility critical for this age group.

Through a planning grant received through the Massachusetts Office on Disability, the Town of Peru worked with Berkshire Regional Planning Commission (BRPC) to prepare this Americans With Disabilities Act Self-Evaluation & Transition Plan.

The Americans with Disabilities Act (ADA) is a Federal civil rights law that provides protections to those living with disabilities. The ADA ensures that those with a disability cannot be excluded from participating in, or denied the benefits of access to buildings, community facilities, programs, services and activities offered by state and local governments. These protections also cover current and future employees of the Town of Peru, as the ADA law prohibits employers from firing, refusing to hire or rehire, or otherwise discriminating, against a "qualified" person with a disability, on the basis of that disability and obligates employers to provide "reasonable accommodations" to allow them to fulfill the duties of their jobs.

As required by the guidelines provided through the Massachusetts Office on Disability and the New England ADA Center, Peru's ADA Self-Evaluation & Transition Plan includes an evaluation of Town-owned properties and buildings (Town Hall/Community Center, Highway Department and Transfer Station, Fire Department, and three Town Cemeteries) and outdoor public spaces (Playground, Pavilion and Ballfield) with barrier-removal recommendations for each. The assessment of physical barriers and recommendations for their removal, are based on the current 2010 ADA Standards for Accessible Design (2010 ADA Standards.)

This Transition Plan also includes recommendations for policies and procedures for adoption by the Town of Peru's municipal departments, including a resource list for

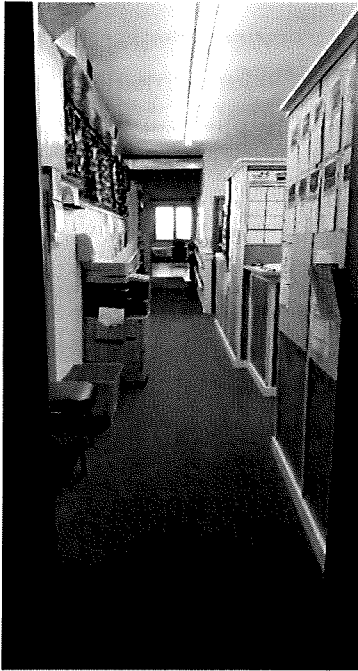
ongoing training and supports, to help increase access to town services and programs for persons living with disabilities.

Like many communities in Massachusetts, Peru contains aging infrastructure, that has been updated as needs have changed and budget funding has allowed, over the course of many years. Peru's distinction as having the Town center at the highest elevation in the state, makes it especially susceptible to the effects of harsh weather. In addition to steep and hilly terrain, the soils in Peru are mostly clays, with a high water table and slow percolation rates creating wet conditions for many months of the year. Pavement management and parking lot maintenance for this small community is a constant and costly challenge.

The most immediately-apparent ADA accessibility issue, upon approach to all Town properties, is the general absence of street improvements to increase accessibility, such as curb cuts or paved and delineated access routes. The pavement in the parking areas surrounding each building and the play areas, is in very poor condition. Uneven surfaces, characterized by loose gravel, potholes and ruts, creates unsafe conditions for all users. Filling, regrading and re-paving all outdoor parking lots and access routes at Town Hall, the Highway Department and Transfer Station and the Volunteer Fire Department and adjacent playgrounds, should be a priority for the Town of Peru, to achieve greater ADA compliance.

ADA Accessible parking signs are present at both Town Hall and the Transfer Station (and recently removed from outside the Fire House after being hit by a vehicle.) However, the lack of intact paved surfaces makes it currently impossible to delineate the location and extent of accessible parking spaces, access aisles and safe routes into each building or facility.

The good news is that the Town of Peru is making strides toward providing more services for residents with greater accessibility, having erected a new Volunteer Fire Station in 2013 and installed a new playground, pavilion and baseball backstop within the last few years.



The Town Hall has an extra- wide center aisle on its main level, public bulletin boards mounted at an accessible height and three compliant restrooms in service. This Spring, a new emergency exit door and hardware were installed in the main floor Conference Room, with more improvements to follow. In addition, the Highway Department Transfer Station lot is scheduled to be repaved, since the Article was approved at the Town Meeting held on May 18, 2019.

The Town Hall and Community Center at 3 East Main Road (Rte.143) is clearly the hub of activity in Peru. It is the location of all Town Administrative offices, contains public meeting spaces on two floors and is the site for the Annual Town Meeting and all Elections. Designed originally as an elementary school in the 1950's, the building was converted to use as a Town Hall during the late 1980's and renovated for ADA compliance after the Law was enacted in 1991 and subsequently, as funding allowed.

The Town of Peru Board of Selectmen's stated goal is to seek funding to renovate office and meeting spaces in the building, to make better use of the space and allow for greater public access to Town services, especially for those living with disabilities. A renovation of the size anticipated would require that the work identified in the Transition Plan to remove the identified barriers be undertaken as part of that planned renovation, per ADA and Massachusetts state law.

For a small community like Peru, with a very tight budget, completing this ADA Self-Evaluation & Transition Plan is an important and necessary first step toward greater ADA Compliance.

The ADA Transition plan section is formatted as a pull-out spreadsheet. Title II of the Americans With Disabilities Act only requires the listing of physical obstacles, the methods to be used to make the facilities accessible, the schedule for the barrier's removal and the identification of the responsible Town official. Space is provided in the Transition Plan spreadsheet to add cost estimates for each identified barrier and a list of potential sources of funding. The ADA Transition Plan is meant to be both a guidance document, usable by all Town Departments in planning, budgeting and grant writing, as well as an easy-to-update checklist towards fuller compliance, over time.

Background on the Americans With Disabilities Act

The ADA is a Federal civil rights law first enacted in 1991 and amended several times subsequently. Under the ADA, civil rights are guaranteed to all individuals, including any who experience discrimination because they 1) have a physical or mental impairment that substantially limits a major life activity, 2) have a record of such an impairment, and 3) are regarded as having such an impairment.

Interpretation of the law and its enforcement was intended to be carried out on a case by case basis, through the nation's legal system. Specific complaints of individuals may be filed with different federal agencies, including the Equal Employment Opportunity Commission (Title I), the United States Department of Justice (Titles II and III), the United States Department of Transportation (Titles II and III), and the Federal Communications Commission (Title IV).

The two sections of the ADA that are pertinent to this report are Title I, *Employment* and Title II, *State and Local Government*.

In addition, the Commonwealth of Massachusetts has established a separate standard - 521 CMR: *The Rules and Regulations of the Massachusetts Architectural Access Board* (and as amended) – that is also required of local governments. These state regulations are designed to make public buildings and facilities accessible to, functional for, and safe for use by persons with disabilities. (521 CMR 2.1). The 521 CMR regulations are incorporated by reference as a special code in the Massachusetts State Building Code.

Title I: Employment

42 U.S.C. § 12111, et seq.

The law prohibits employers from firing, refusing to hire or rehire, or otherwise discriminating, against a “qualified” person with a disability on the basis of disability and obligates employers to provide “reasonable accommodations”. To be “qualified,” a person must be able to perform the essential functions of the job, either with or without a reasonable accommodation. Employers are not required to provide an accommodation that would eliminate an essential function of an employee’s job or would pose an “undue hardship” for the employer. An accommodation is provided at the employer’s expense, unless the employer can demonstrate that it would pose an undue financial hardship. The law applies to employers with 15 or more employees.

Title IIA State and Local Government

42 U.S.C. §12131, et seq.

State, local and municipal governments must provide equal opportunity for persons with disabilities in all programs, activities, services and employment practices. People using service animals must be allowed equal access. Effective communication must be ensured with persons who are deaf, hard of hearing and blind or who have cognitive disabilities through provision of auxiliary aids and services. Under a concept called "programmable access," every part of every facility need not necessarily be accessible. Instead, the programs, activities and services when viewed in their entirety must be readily accessible to and useable by persons with disabilities. Individuals may also file private lawsuits.

The process for complying with the Americans with Disabilities Act is as follows;

1. Learning about the requirements of the ADA and how it applies to a facility or program;
2. Conducting a survey to identify barriers;
3. Establishing a list of potential physical modifications for barrier removal, as well as changes to municipal policies to increase access to services.
4. Establishing a timeframe for barrier removal and identifying the person or department responsible for doing so.

The ADA prohibits discrimination on the basis of disability in all services, programs, and activities provided by government entities. Thus, people with disabilities must have an equal opportunity to participate in and benefit from a town's services, programs and activities. To accomplish this, the ADA sets requirements for town facilities, new construction and alterations, communication with the public and policies and procedures governing town programs, services, and activities. The layout of a public building should allow people with disabilities to obtain goods and services and to participate in activities without assistance.

All municipalities of any size must perform a Self-Evaluation of their policies, practices, programs, procedures and services, including communications, to determine compliance under the ADA. Towns must make reasonable modifications to these policies, programs, services, etc., to avoid discrimination against individuals with disabilities, unless such modification would result in a fundamental alteration in the nature of that program or service.

Although the ADA only requires local governments with 50 or more employees to take additional, specific measures, it is strongly recommended that even smaller towns like Peru, with less than 50 employees, follow the same process to insure overall compliance with the ADA. These additional measures include 1) the designation of an

individual to coordinate ADA compliance, 2) the development of a Transition Plan, and the development of an ADA Grievance Procedure.

The 2008 Amendments to the ADA broadened the definition of "disability", thereby extending the ADA's protections to a greater number of people. The 2008 Amendments provided examples which limit "major life activities" including, but not limited to, "caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working" as well as the operation of several specified major bodily functions. The Amendments also stated that when determining whether one qualifies as disabled, one cannot take into account the mitigating effects of assistive devices, auxiliary aids, accommodations, medical therapies, and supplies.

In order to be protected under the ADA, an individual with a disability must also be qualified to perform the essential functions of a job with or without a reasonable accommodation.

In 2010, the Department of Justice revised regulations for Titles II and III of the ADA of 1990. These revised regulations adopted enforceable accessibility standards called the 2010 ADA Standards for Accessible Design. On and after March 15, 2012, compliance with the 2010 Standards was required for all new construction and alterations under Titles II and III. March 15, 2012, is also the compliance date for using the 2010 Standards for program accessibility and barrier removal.

The 1990 ADA Standards for Accessible Design could be used for new construction and alterations under Title II until March 14, 2012. These dates are pertinent to Peru, depending on when town buildings or other facilities were built or rehabilitated.

Methods of Providing Program Access

When a service, program, or activity is located in a building or facility that is not accessible, Title II of the ADA allows a "small" local government to achieve program accessibility in several ways. This can include:

1. Relocating the program, service, or activity to an accessible facility; or
2. Providing the program, service, or activity in another manner that meets ADA requirements; or
3. Undertaking modifications to the building or facility itself to provide accessibility.

Thus, to achieve program accessibility, a small town need not make every existing facility accessible. It can relocate some programs to accessible buildings or facilities and modify others, avoiding expensive physical modifications to all town facilities.

The Department of Justice does not interpret the ADA to require that all slopes, uneven terrain or physical obstacles be removed in outdoor spaces like a cemetery, in order to meet requirements for program access. Program access in the case of a cemetery, might mean providing transportation to or near a gravesite in a vehicle operated either by a family member, funeral director or by cemetery staff, but would not require that the cemetery landscape be leveled to permit a wheelchair user to get to a gravesite. (Source: Dept. of Justice website Q&A)

Effective Communication and Website Access

Local governments must ensure effective communication with individuals with disabilities. Where necessary to ensure that communications with individuals with hearing, vision, or speech impairments are as effective as communications with others, municipal governments must provide appropriate auxiliary aids.

Though the type of "auxiliary aids" will vary by person, they may include such services or devices as sign language interpreters, assistive listening headsets, telecommunications devices for deaf persons (TDDs), videotext displays, readers, Brailled materials, computer disks, audio recordings, and large print materials. In addition, telephone emergency services, including 911 services, must provide direct access for individuals with speech or hearing impairments.

Municipal governments are not required to provide auxiliary aids or take any actions that would result in a fundamental alteration in the nature of a service, program, or activity, or that will result in undue financial and administrative burdens. However, alternative auxiliary aids that do not result in a fundamental alteration or undue burden must be provided. For example, day-to-day interaction with hard of hearing individuals may be through written notes or text by phone or email. However, public meetings, interrogations by local police officers, or similar technical interactions will most likely require interpreters or assistive listening systems. It is **required** that alternative auxiliary aids be available that do not result in financial or administrative burdens, yet meet the needs of the disabled.

ADA SELF-EVALUATION

During the months of April through June, 2019, Berkshire Regional Planning Commission (BRPC) worked with the Town of Peru to complete a Self-evaluation that considered all of the municipality's programs, activities, and services, as well as the policies and practices that it has put in place to implement its various programs and services.

An initial meeting was held with Peru's ADA Coordinator to review the project scope. The following week, BRPC appeared at a meeting of the Peru Board of Selectmen which included the participation of Department Heads from the Fire, Highway and Police Departments, to review the project requirements and to ask for their participation. Site Evaluation dates were established subsequently, at each department's convenience.

A survey was sent by email to all of Peru's municipal departments, boards and commissions that offer services, programs or activities to the public. (See Survey, Appendix A). Information from each survey response, along with information gathered from one-on-one interviews with selected departments and by telephone interviews with others, was used to complete the Self-Evaluation of programs, activities and services.

Only four departments in the Town of Peru completed the municipal services, programs and activities Survey. Follow up phone calls to some departments to review answers elicited some clarifying information. The four departments that did respond found the Survey language confusing or indicated that the questions were "not applicable" to their work.

The survey responses indicate a general lack of knowledge around the Americans With Disabilities Act requirements for local government officials.

There was acknowledgment among respondents that currently Peru's departments do not state specifically on the Town website, program literature or announcement flyers that their Programs, Services and Activities do not discriminate on the basis of disability, nor do they mention the availability of auxiliary aids.

No department receives Federal funds, though some collect permit or application fees (e.g. Board of Health.)

Program Accessibility – No department regularly advertises physical or programmatic accessibility to events and services. No department has assistive listening devices, TTY or onsite telecommunication devices for the deaf. Though

departments DO have the ability to print materials in large Typeface, none of them do so regularly.

Non-Structural Program Modifications - There is currently no specific outreach to disabled members of the community, nor do people with disabilities provide advice to any department on programs or activities that the Town provides. There is no provision for auxiliary aids, such as TDD, audio tapes, sign language interpreters to make programs available to people with communications impairments. No department has materials for communicating with people with learning or developmental disabilities.

Remedial measures necessary to bring the programs, policies, and services into compliance with Title II are detailed below - including, but not limited to 1) relocation of programs to accessible facilities; 2) offering programs in an alternative accessible manner; 3) structural changes to provide program access; 4) policy modifications to ensure nondiscrimination; and 5) auxiliary aids needed to provide effective communication

Following is a list of Title II requirements, with the current status of each in Peru, noted in bold type, in parentheses. Additional information and recommendations appear in subsequent paragraphs:

1. Designate a responsible employee as ADA Coordinator (**Completed, 2018.**)
2. Adopt, post and distribute a Public Notice on the municipality's ADA policies and procedures. (**Completed, 2018**)
3. Adopt, distribute and/or post an ADA Grievance Procedure (See ADA Title II- 35 CFR Part 35.107 (b)). (**Completed, 2018**)
4. Modify, maintain, and update Municipal Policies, Procedures, and Practices, including job descriptions and hiring practices, as required. (ADA Title II - 35 CFR Part 35.130 (b)(7) (**Recommended**))
5. Provide Reasonable Accommodations to qualified individuals with disabilities. (ADA Title II - 35 CFR Part 35.140 (a)) (**Recommended**)
6. Maintain accessible features (ADA Title II - 28 CFR Part 35.133 (a) (**Recommended**))
7. Provide auxiliary aids and services to ensure effective communications to those with disabilities. (ADA Title II- 28 CFR Part 35.160) (**Recommended**) and adopt Web Content Accessibility Guidelines 2.0 AA or Section 508 Standards (**Completed per website provider, 2018**)
8. Establish a 5-13 member Commission on Disability (MA General Laws C40 s8J (**Recommended**))

#1-3 Completed, 2018.

#4 ADA Recommendations - Municipal Policies, Procedures, and Practices: Under the ADA, a municipality should have formal, separate policies and procedures pertaining to program accessibility, grievances, communications, equal opportunity and non-discrimination. A municipality should also include separate non-discrimination language in its Employment postings in a form similar to the following:

"The Town of Peru is an Equal Opportunity/ Affirmative Action Employer. We assure you that your opportunity for employment with the Town will be based only on your merit, without regard to race, religion, sex, age, national origin or disability"

A public entity shall make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity.

It is RECOMMENDED that the Town of Peru update or establish separate, written policies, procedures and practices pertaining to ADA program accessibility and communications, similar to their already-established Grievance procedures and Equal Opportunity/Non-Discrimination policies.

#5 ADA Recommendations: Reasonable Accommodations in Employment

Under the ADA, a person is considered a qualified individual with a disability if s/he can perform essential functions of a job with or without a reasonable accommodation. Although the ADA does not require an employer to have job descriptions, they can be used as evidence of the essential functions of the job. Job descriptions should be up-to-date and should differentiate between the essential and the marginal duties of the position.

Peru does create job descriptions that meet the general intent of providing reasonable accommodations. As previously noted, it appears that most job postings contain the following language, "***Equal Opportunity Employer.***"

It is RECOMMENDED that the following additional ADA language be added to each job description or posting:

" In compliance with the Americans with Disabilities Act, the Town of Peru will provide reasonable accommodations to qualified individuals with disabilities and encourages both prospective and current employees to discuss potential accommodations with the Town."

#6 ADA Recommendations - Ongoing Maintenance of Accessible Features

A municipality must maintain in operable working condition those features that are necessary to provide access to services, programs, and activities for all residents and visitors. This includes items such as door closers, sidewalks, parking space signage and striping, ramps and lighting, among many others. Isolated or temporary interruptions in service or access are permitted for maintenance or repairs only.

When weather conditions such as snow and ice may limit or prevent access to Town services, programs, and activities to or within a facility, access must be maintained to ensure that those programs are accessible. Maintenance of accessible features includes the removal of snow from accessible parking spaces; curb ramps and accessible routes of travel and entrances, to a minimum width of 36".

It is RECOMMENDED that the Town of Peru review and include ongoing maintenance duties in departmental policies and in job descriptions for each position, to ensure access to services, programs and activities is provided all year long and in all weather conditions.

#7 ADA Recommendations - Effective Communication, Auxiliary Aids and Services

Local governments must ensure effective communication with all residents and visitors including individuals with disabilities. To ensure communications with individuals who have hearing, vision or speech impairments, municipal governments must provide appropriate auxiliary aids. The type of auxiliary aids or services necessary to ensure effective communication will vary according to the type of communication involved and the needs of the individual. Auxiliary aids include such services or devices as sign language interpreters, assistive listening headsets, telecommunications devices for people who are deaf such as TDD's or video phones, use of 911 telephone interpreter service, Brailed materials, documents in electronic format, audio recordings and large print materials. Telephone emergency services including 911 must provide direct access for individuals with speech and hearing impairments.

It is not necessary to provide sign language interpreters for all interactions with persons who are deaf or hard of hearing. Daily interaction may suffice through written notes or similar means. However, public meetings, interrogations by local police officers, or similar technical interactions require interpreters or assistive listening systems, when requested. It is required that alternative auxiliary aids be available that do not result in financial or administrative burdens to the Town, but meet the needs of the disabled individual.

At the present time, daily interactions in Peru are generally handled by written notes, email or by telephone. Interpretive services are available through Berkshire Health Systems. The Town also utilizes Hamilton Relay Services for the Deaf, on an as-needed basis.

It is RECOMMENDED that the Town obtain one assistive listening device for public meetings, purchase brailed directional signage for all Town Departments and make it a regular practice to provide large print materials for dissemination.

Website Accessibility - The Department of Justice (DOJ) considers websites to be an integral aspect of how Title II entities interact with their citizens and the public and therefore they need to be accessible. There are currently no ADA Standards for accessible information technology, so the DOJ recommends compliance with the W3C Web Content Accessibility Guidelines 2.0.

The Official website for the Town of Peru (<https://www.townofperuma.com>), is designed by the web-design company CivicPlus, that specializes in municipal websites. Upon request, the web developer is able to maximize the Town website for persons with low vision, for example by adding contrasting colors, larger fonts, HTML tags and text below each image, so a reader can “translate” the image into a spoken description. Peru’s ADA Coordinator contacted Civic Plus for this Self Evaluation and Transition Planning process and they confirmed that the Town website is already ADA Compliant, in terms of the W3C WCA Guidelines.

However, Peru’s municipal website currently does not display current information relative to each departments’ programs and services. A statement of the Town’s compliance with the ADA is not provided anywhere on the website, nor is there any information regarding disability-related issues. There is no information that an assistive listening device is available at the Town Hall, or about the accessibility of different Town-owned facilities. The website does not list TTY phone numbers nor is there any offer of TTY availability. Announcements of upcoming events do not include information regarding accessibility of the event/location. There is no notice posted on the website about the opportunity for requesting accommodations, such as in the following example:



If you are deaf or hard of hearing, or are a person with a disability who requires accommodation, please contact (Departmental contact) at (telephone #) or by fax to (fax #), or email: name@townofperuma.com.

It has not been officially established which staff persons in the Town of Peru have the job responsibility for performing timely Town website updates, including the above-noted provision of disability-related language, access and services.

It is **RECOMMENDED** that the Town of Peru add ADA-specific policies and procedures to the Town's employment policies and job descriptions, for keeping the official Town website and public notice procedures up-to-date and compliant in each department.

#8 ADA Recommendations – Establish a 5 to 13-person Commission on Disabilities

With a population of approximately 823 people, the Town of Peru ADA Coordinator should continue efforts to establish a permanent Commission on Disability.

It is **RECOMMENDED** that the Town of Peru ADA Coordinator post the opening for volunteers to serve on the Peru Commission on Disability on the official Town website, on public bulletin boards and share the posting widely through social media, local and town newspapers and other media outlets. Alternatively, Peru's Employment policies and job descriptions might be updated to include the requirement that a least one representative from each Town department meet at least once per year with the ADA Coordinator to review the status of departmental ADA compliance, and thereby serve as a standing ADA Commission.

In accordance with the ADA Standards, a thorough evaluation of all of the Town of Peru's public buildings, recreation facilities and cemeteries was conducted to identify physical barriers to programs and services provided therein. The evaluation included a guided walk-through conducted by BRPC staff with Town department personnel, documented by photographs and measurements. The resulting Transition Plan provides a description of the obstacles that were identified that limit mobility or access, the type of action required to be taken for compliance, the person responsible for their removal, and the timeframe for completion. A photograph of each item is provided for reference, as is a place for cost figures and potential sources of funding.

The following Transition plan is formatted to be a pull-out section, divided by Town department/building or facility.

Municipalities are required to adhere to the 2010 Standards for Accessible Design in new construction and when undertaking any alterations to an existing facility. Programs must be relocated or access provided in inaccessible existing facilities as of the effective date of the ADA - January 26, 1992. When existing facilities comply with the 1991 Standards, there is no requirement to update to the current 2010 Standards. However, if conditions in existing facilities do not adhere to the original Standards, then the 2010 Standards must be followed. For the purposes of this plan, unless specifically noted, facility assessments are based on the 2010 ADA Standards and 521 CMR (Massachusetts Architectural Access Board MGL. C. 22 s13A), whichever is more stringent.

The plan does not address what is already accessible but rather, identifies remaining impediments to access. Fieldwork was performed April and May, 2019. Although general recommendations are made as corrective actions to eliminate identified obstacles, the Town of Peru will be solely responsible for designing the specific solution in accordance with the ADA or the MA 521 CMR.

Appendix A**Peru Department, Board and Committees Programs & Services List
and ADA Survey**

Departments	Contact	Services Provided	Completed Survey? (Y or N)
Emergency Management 413-655-8312	Rick Carll	Directs the preparedness, response and recovery from different emergency situations that a town may encounter	No
Accountant Anna Osborne- (413) 655-8312 Ext. 5	Anna Osborne	Producing and processing payroll/vendor accounts payable for all town departments	No
ADA Coordinator 413-655-8312 Ext. 0	Caleb Mitchell	Coordinates and implements ADA compliance activities	Yes
Animal Control 413-655-8092	Verne Leach	Mass Animal Fund Program for spay/neuter, investigate mistreated animals, aid with dangerous, abandoned, or lost animals, annual barn inspections	No
Constable 413-655-8312	Coralie Pelkey	Responsible for the service of process: summonses and subpoenas	No
Council on Aging 413-212-6829	Margaret Chieffo	Support services for the elderly and their families/caregivers like outreach, socialization, and transportation	No
Cultural Council of Peru/Hinsdale	Kristen Parker	Educate and promote the community in arts, humanities, and sciences	No
Board of Appeals 413-655-8312	David S Strzepa	Appeals in zoning ordinance matters and aiding with zoning bylaws	
Board of Assessors(413) 655-8312 Ext. 4;	Karen Tonelli (Chair) Amy Davidson Shana Lecours	Property tax bills, assessors tax maps and property cards, applications for abatements/exemptions of taxes	No
Fire Department 413-655-8811	Brian Dewkett, Chief	Responds to emergencies like tree on wire, fires, medical, car accidents, lightning strikes	No
Police Dept. 413-655-8377 Ext. 6;	Jeff Henault, Chief	Patrol the town, respond to calls for various situations, enforcing laws and ensuring safety	Yes
Historical Commission 413-655-8312	James Kenney	Documenting historical sites, featuring history for the 250th anniversary of the town, and promoting historical sites on the website	No
Town Clerk 413-655-8312 Ext. 2;	Kim Leach	Custodian of official town records, files all board and committee minutes, recording officer, maintains division of local services gateway, receives/records all applications and decisions of the appeal board, files bylaws, public	No
Select board 413-655-7707	Ed Munch (Chair) Verne Leach	Calling town meetings, public policy, elections, licensing, setting fees, and regulations	Yes – Irene (Town Admin. Assistant)
Board of Health 413-655-8054	Kay Miller (Chair) Nanette Mone Peggy White	Public health education and permitting for septic, garbage, wells, camps, and food service/events.	Yes – Peggy White
Town Administrator 413-655-8312 Ext. 0	Caleb Mitchell	Oversee operations, advise and administer policies from the selectmen, enforce bylaws passed during the town meeting	Yes – Caleb Mitchell

Planning Board (413)395-4463;	Kimberly Wetherell, Richard Nelson, William Tatro Dale Weeks, Samuel Haupt, (Chair)	Provide guidance on the growth and development of the town	No
Highway Dept/Transfer Station 413-655-8312 Ext. 110	Justin Russell, Supt.	Road reconstruction/repaving, mowing and weed whacking, cutting brush/trees, and plowing; Trash Collection and Recycling Facility	No
Building Inspector (413) 655-8312 Ext. 3;	Tim Sears	Ensures all construction, alterations, renovations, and repairs are in compliance with Massachusetts state building code	No
Cemetery Sexton 413-655-8524	Darryl Darby	Cemetery Operations	No
Health Inspector 413-717-8922	Jayne Smith	Health inspections, flu clinics, septic system inspections, infectious diseases, public beaches, private wells, demolition inspections, public pools, food establishments, septage haulers, garbage haulers, recreational camps, housing inspections, temporary food permits	See Bd of Health
Conservation Commission 413-655-8312 Ext. 0	William Tatro Kimberly Wetherell Mike Frederick, (Chair)	Protecting the community's natural resources and wetlands bylaws	No
Tax Collector 413-655-0072 Ext. 1;	Caryn Wendling	Responsible for billing, collection, processing, and recording all taxes, collection of property, benefits assessments and current use policies and all receivables due to the town	No
Tree Warden 413-655-8224	Justin Russell	Responsible for trees on public property; forestry program	No
Bd. Of Registrars Gordon 413-665-8312 Ext. 2	Scott Seely, Tina Barrington, Joann Gordon	Keep track of registered voters, conducting elections, accepting nomination paperwork, and certifying initiative/referendum petitions	No

Town of Peru Department, Board/Committee Survey

Department: _____

Building/Facility Address: _____

Person Interviewed: _____

Date: _____

A. Departmental Programs, Services & Activities

Please list all the programs and services offered to the public by your department (use separate sheet if necessary, or provide attachments from existing program brochure or other.)

- Approximately how many people use your department's services or participate in your programs each year?
- What source of funds pays for your programs? Do you charge any user fees?
- Do you receive any federal grants? Yes or No (circle)

2) Are the elected and/or appointed officials and employees affiliated with your department aware of the ADA and its possible impacts on town government programs, services and activities?

☐ Yes ☐ No ☐ Not Applicable

a) Through methods such as public notices in print, audio, and visual media, does your department inform the general public, including people with disabilities, that your programs, services or activities do not discriminate on the basis of disability in admission, access/participation, or employment? *(If yes, please provide a sample)*

☐ Yes ☐ No ☐ Not Applicable

3) Have you ever conducted outreach or made public information presentations to any of the following? *(If yes, when?)*

The public	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Employees	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Employment agencies	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Organizations representing people with disabilities	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Professional or business associations active in Peru or in the surrounding area	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Other (cite):	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A

4) Does your outreach include notice about non-discrimination and disability accommodations in any departmental publications, recruitment materials, program applications or other literature that contains general information about your department's programs and services? *(If yes, please attach an example.)*

☐ Yes ☐ No ☐ Not Applicable

a) In your advertisements, website, press releases, newsletters, and other publications, do you emphasize that your programs, services and activities are accessible to people with disabilities? *(If yes, ask to see an example.)*

☐ Yes ☐ No ☐ Not Applicable

b) Do you advertise programs, services or activities using social or other media so that visually, speech, or hearing impaired people can learn of your program independently? *(If Yes, please attach an example.)*

☐ Yes ☐ No ☐ Not Applicable

c) Have you ever worked, or do you work actively today, with social service or advocacy organizations in order to accommodate participation by people with developmental disabilities such as mental retardation, autism, cerebral palsy, seizure disorders, or head injuries?

☐ Yes ☐ No ☐ Not Applicable

d) If yes, what types of outreach or public information did you offer in order to work with such organizations and their clientele? And what kinds of accommodations did you make to include people with developmental disabilities?

B. Program Accessibility

- 1) Can a person with disabilities take part in/utilize any of your programs, services or activities, whether as an employee, citizen volunteer, participant, observer, visitor, client or student? To assess the degree to which your department's services are program accessible, consider the following criteria. *(Please provide examples if applicable)*

Does your department regularly advertise physical access to its events and services?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Does your department regularly advertise programmatic access to its events and services?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Is there a fee or charge to attend or participate in the program?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Is there a fee or charge to use the facilities?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Are there discounts available?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Does your department have Text Telephones (TTY) or Telecommunication Devices for the Deaf (TDD)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Does your department have assistive listening devices?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Is your printed material available in large print?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Does your department have materials for communicating with people with learning or developmental disabilities?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A

- 2) Do people with disabilities have the same opportunity to participate as non-disabled people, and are your programs designed to include both disabled and non-disabled people?

☐ Yes ☐ No ☐ Not Applicable

- 3) List programs or services in which people with disabilities participate:

- 4) Do you currently sponsor or provide any programs, services or activities specifically for people with disabilities? ☐ Yes ☐ No ☐ Not Applicable
- 5) Can a qualified person with a disability participate in your programs as an employee, citizen volunteer, participant, observer, visitor, client or student? (Mark "Y" for "yes" items; "N" for "no" items; "NA" for items not applicable.)

Disability Type	Is the program accessible?	Are all activities of the program accessible?	Are products of the program usable by people with a disability? ¹	Is the facility accessible?
Hearing impaired				
Visually impaired				
Other sensory impaired				
Mentally impaired				
Mobility impaired				

Program Modifications (Non-Structural)

- 1) Do you have people with disabilities serving as advisors to your department or any of its programs, services or activities?
- ☐ Yes ☐ No ☐ Not Applicable
- 2) Have you ever relocated or rescheduled any programs to an existing accessible facility to make them available to people with disabilities?
- ☐ Yes ☐ No ☐ Not Applicable
- 3) Can you locate your programs or services in a facility that is accessible? (If yes, what facility?) ☐ Yes ☐ No ☐ Not Applicable
- 4) Can you provide auxiliary aids such as TTs (TDD or TTY), audio tapes, or sign language interpreters to make your programs available to people with communication impairments?
- ☐ Yes ☐ No ☐ Not Applicable

¹ "Product" is a broad term and it should be interpreted in light of the programs and services of a particular department. For example, when local government publishes minutes of a public meeting, the minutes are a product.

- 5) What resources would you need to provide these kinds of aids?
- 6) Can you provide adequate communications by presenting all written and spoken materials in other ways, such as by interpreter, in printed form, in braille, on audio tape, in large print, or through illustrations? What resources would you need to provide communications in multiple formats?
- ☐ Yes ☐ No ☐ Not Applicable
- 5) Can you provide awareness training sessions or otherwise sensitize Town employees, elected or appointed officials affiliated with your department to the needs of people with disabilities? What resources would you need in order to provide training?
- ☐ Yes ☐ No ☐ Not Applicable

Appendix B

ADA Compliance Resources

There are a number of free resources available to assist the Town of Peru with the implementation of their ADA Transition Plan and to ensure it meets its obligations to the public.

Grant Funding

Massachusetts Community Development Block Grant Program (CDBG)

CDBG is a federally funded, competitive grant program designed to help small cities and towns meet a broad range of community development needs. Eligible projects include, but are not limited to, housing rehabilitation or development, micro-enterprise or other business assistance, infrastructure, community or public facilities, public social services, planning, removal of architectural barriers to allow access by persons with disabilities, and down or area revitalization. More information about the program can be found at: <https://www.mass.gov/service-details/community-development-block-grant-cdbg>. Berkshire Regional Planning Commission manages the CDBG program in Berkshire County. Contact Patricia Mullins, Community & Economic Development Program Manager at 413-442-1521 x17 for more information.

Massachusetts Municipal ADA Improvement Grant Program

The Massachusetts Office on Disability (MOD) administers the Municipal ADA Improvement Grant program. This funding is aimed at supporting capital improvements to improve programmatic access and/or removing barriers encountered by people with disabilities. Project grants of up to \$250,000 are available. There are also planning grants to assist communities in creating or updating a Self-Evaluation and/or Transition Plan. More information about the program can be found here: <https://www.mass.gov/municipal-americans-with-disabilities-act-grant>

MA DOT Complete Streets Funding Program

A Complete Street is one that provides safe and accessible options for all travel modes, including walking, biking, transit and vehicles – for people of all ages and abilities. MassDOT provides funding to municipalities for technical assistance to analyze their community needs and develop a Complete Streets Prioritization Plan, and funding for construction of Complete Streets infrastructure projects. Also

inherent in the development of a Complete Street is meeting the most current accessibility guidelines outlined by the Americans with Disabilities Act (ADA) and the Massachusetts Architectural Access Board (AAB), which are upheld by Code of Massachusetts Regulations 521 (521 CMR). More information about the program can be found at

<https://massdot.state.ma.us/highway/DoingBusinessWithUs/LocalAidPrograms/CompleteStreets.aspx>. In Berkshire County, Berkshire Regional Planning

Commission provides Complete Streets technical assistance to communities.

Contact Clete Kus, Transportation Program Manager at 413-442-1521 x20.

Community Transit Grant Program

MassDOT administers the Community Transit Grant Program which is the annual competitive grant program to distribute Federal Transit Administration Section 5310: Enhanced Mobility of Seniors & Individuals with Disabilities funds, and State Mobility Assistance Program funds. This grant program provides funding to assist with mobility management activities, the purchase of capital equipment, and operational costs to meet the mobility needs of seniors, defined as those 65 and older and individuals with disabilities of any age. State Mobility Assistance Program (MAP) funds are to assist in the provision of transportation services to seniors and persons with disabilities. MAP funding is exclusively used for the purchase of eligible vehicles, and most often as a State financial match to federally funded capital vehicle purchases. More information about the program can be found here: <http://www.massdot.state.ma.us/transit/CommunityTransitGrantProgram/ProgramInformation.aspx>. Additional information for Berkshire County may be obtained by contacting Robert Malnati, Executive Director, Berkshire Regional Transit Authority, 413-499-2782.

ADA Support Services & Trainings

ADA National Network (<https://www.adatitle2.org/>)

Offers ADA Title II Tutorials designed to help individuals working in state and local governments (ADA coordinators, agency leaders, human resources (HR) and legal professionals, managers, and supervisors) understand and comply with their responsibilities under Title II of the Americans with Disabilities Act (ADA). The Tutorials are self-paced and free of charge.

MassRelay Service

The Massachusetts Department of Mental Health operates the MassRelay service. This service is provided 24 hours, seven days a week, 365 days a year and enables people who are deaf, hard of hearing, late deafening, or speech disabled to communicate with hearing people over regular phone lines. A Relay Operator will complete your call, dialing the party you wish to contact and then stay on the line to relay messages electronically via a TTY or verbally to people who can hear. Dial 711 in Massachusetts or 1-800-439-0183 outside Massachusetts.

**Massachusetts Commission for the Deaf & Hard of Hearing (MCDHH)
Statewide Interpreter/CART Referral Service**

The MCDHH provides statewide interpreter and Communication Access Realtime Translation (CART) referral services. It provides referral services for sign language, spoken English, oral, tactile and close vision interpreting for Deaf and Deaf-Blind individuals, as well as making referral to freelance CART providers for services. They also provide an after-hours Emergency Interpreter Service, an Interpreter Screening service, Interpreter and CART provider trainings, case management, and technical assistance. More information can be found here:

<http://www.mass.gov/eohhs/gov/departments/mcdhh/programs/cart/>

Training and Technical Assistance: Massachusetts Commission for the Deaf & Hard of Hearing (MCDHH)

MCDHH, through the Communication Access, Training, and Technology Services Department (CATTS) provides information and training to the public on issues of deafness and hearing loss. Free in-service or educational services/presentations can be provided for any organization or business seeking to improve their effectiveness in interacting with people who are deaf and hard of hearing. They also provide technical assistance on assistive technology to public and private agencies, professional organizations, businesses and individuals related to all aspects of technology for the deaf and hard of hearing individuals. In addition, they also create a number of publications with a wide range of topics related to deafness and hard of hearing. For more information visit their website

at:<http://www.mass.gov/eohhs/gov/departments/mcdhh/programs/communicate-train/>

Massachusetts Commission Against Discrimination (MCAD)

MCAD provides discrimination prevention training to the public and for workplaces. Training sessions range from two hours to four days in length, depending on the topics covered. They also offer Equal Employment Opportunity Certifications for individuals who currently provide, or seek to provide, employment discrimination prevention training, conduct internal discrimination complaint investigations and/or respond to accommodation requests. For more information, see:

<https://www.mass.gov/training-and-outreach>

Massachusetts Office on Disability (MOD)

MOD's mission is to "bring about full and equal participation of people with disabilities in all aspects of life...in a manner that fosters dignity and self-determination. They have four areas of focus: 1) Providing Training; 2) Advocacy; 3) Monitoring; and 4) Resources. MOD provides training to various entities in a variety of formats on all topics related to the state and federal civil rights laws that govern disability discrimination. Topics may include but are not limited to: ADA, Fair Housing Act, Section 504 of the Rehabilitation Act, M.G.L. Chapters. 151b and 272, Service Animals, Vocational Rehabilitation and Independent Living Services and Programs, and Architectural Access Regulations. MOD also provides architectural review/site visits, either through plan review or on-site visits to ensure compliance with the various building requirements specific to persons with disabilities. Training and Architectural Review/Site Visits can be requested at:

<http://www.mass.gov/anf/employment-equal-access-disability/disability-info-andresources/education-andtraining/customized-trainings.html>

ADA Coordinator Certification Program

The ADA Coordinator Training Certification Program is offered by the University of Missouri and the Great Plain ADA Center Classes are offered online and through trainings offered at various conferences the University hosts. Following the successful completion of the program, the participant will have the knowledge base essential to performing the role of an ADA Coordinator. Course and certification requirements can be found on their website:

<http://www.adacoordinator.org/?page=About>

National ADA Symposium

This premier, national four-day event includes more than eighty breakout sessions on every aspect of ADA. It is a project of the ADA National Network and is

organized and run by the Great Plains ADA Center. For more information about the Symposium visit: <http://www.adasymposium.org/>

New England ADA Center

New England ADA Center is one of 10 regional ADA Centers comprising the ADA National Network. They provide information, guidance and training on ADA tailored to meet the needs of business, government and individuals at local, regional and national levels. Their website has a clearing house of ADA training topics that are no cost web-based courses in addition to publications and best practices resources. It is also a good source of language and examples of draft policies. Their website is here: <https://www.newenglandada.org/>

United States Access Board

The Access Board is an independent federal agency that promotes equality for people with disabilities through leadership in accessible design and the development of accessibility guidelines and standards. Created in 1973 to ensure access to federally funded facilities, the Board is now a leading source of information on accessible design. The Board develops and maintains design criteria for the built environment, transit vehicles, telecommunications equipment, medical diagnostic equipment, and information technology. It also provides technical assistance and training on these requirements and on accessible design and continues to enforce accessibility standards that cover federally funded facilities.

The Board is structured to function as a coordinating body among federal agencies and to directly represent the public, particularly people with disabilities. Twelve of its members are representatives from most of the federal departments. Thirteen others are members of the public appointed by the President, a majority of whom must have a disability. Their website is <https://www.access-board.gov/>.

Peru Town Hall Transition Plan


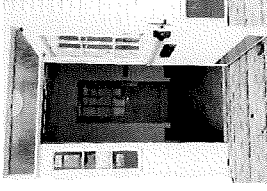
Title II only requires listing physical obstacles, the methods suggested to make the facilities accessible, the schedule and the responsible official. For convenience, spaces for cost estimates and potential sources of funding were added.


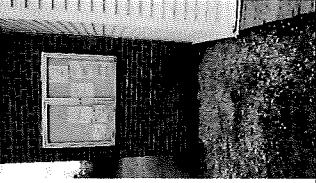
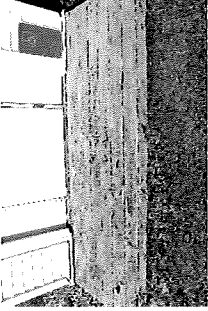
Facility PERU Town Hall & Community Center Date June, 2019

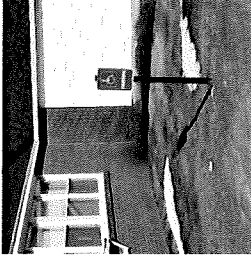
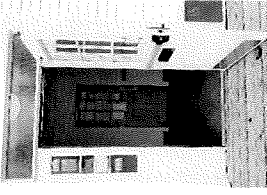
Contact Person ADA Coordinator Department Town Administrator


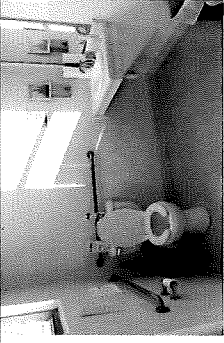
Email Town Administrator <townadmin@townofperuma.com> Phone 413-655-8312 x0

Approach & Entrance

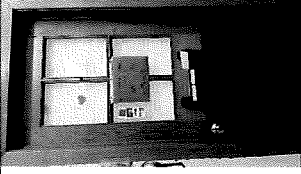
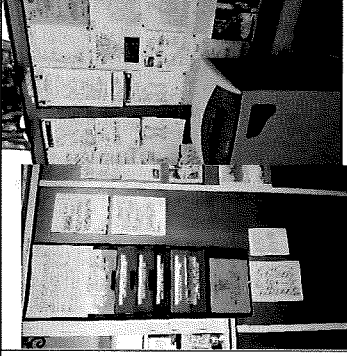
Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Parking Lot - Accessible Parking Spaces (Front Entrance	Ground /All	Uneven / Degraded surface; no curb cuts; no striping no designated van accessible space, no safe travel route	Re-grade and pave to achieve stable, firm, slip resistant surface Paint striping for accessible spaces/ safe routes to building				E.g. Capital budget; Community Compact programs, ADA grant; MA DOT Complete Streets, USDA Community Facilities Grant & Loan pgm.	
Front Entrance Door	Ground /All	Front Door hardware	1) Adjust door closer to allow >5 sec. swing to 12 degrees (starting w/door at 90 degrees); 2) Install electronic door opener					

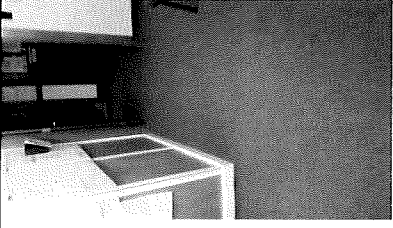
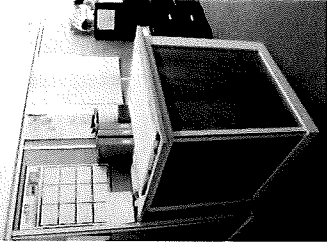
Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Front Entrance – Threshold	1 st / All depts.	Exterior wood threshold uneven, loose gravel	Replace with concrete pad or other solid, level surface no more than ¼" higher than adjacent surface					
Exterior Public Bulletin Board	1 st / All depts.	Loose gravel and uneven surface underneath bulletin board blocks access	Replace with concrete pad or other stable, level, firm, slip-resistant surface					
Front Accessible Entrance Sign	1 st / All depts.	Accessible Entrance Sign	Remount sign on front of building 60" off ground					


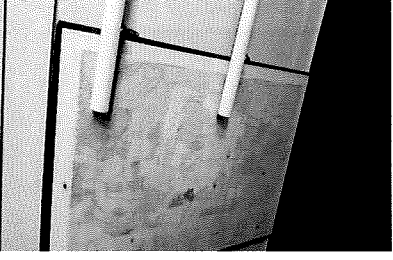
Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Accessible Parking Signage	1 st	Sign on post	Re-mount sign 60" off ground					
Front Entrance	1 st / All depts.	Vestibule – Inside Door is heavy and hard to open	1) Install automatic door opener					
Front Entry	1 st	Vestibule & Hallway	Install flooring in ADA compliant type – stable, firm, slip resistant carpet/mat no higher than ½" thick					See above



Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Front Entry	1 st	Vestibule	Install accessible height literature display rack on 1 side (only) – i.e. remove doors from present unit and use inside shelves for literature display					
Front Hallway	1 st /All depts.	Front Hallway	Install motion-sensitive light switch (and higher wattage lamps in ceiling light fixtures)					Too dark to take photo!
Ladies & Mens Accessible Bathrooms	1 st /All	Coat Hooks	Install coat hook in each room - no less than 15" and no more than 48" above floor.					
Mens' Accessible Bathroom	1 st /all	Flush control not on open side of the water closet	Swap out tank with another unit with flush control on right side					
Mens' Accessible	1 st /All	Exposed pipes below sink	Install cover panel to protect against knee					

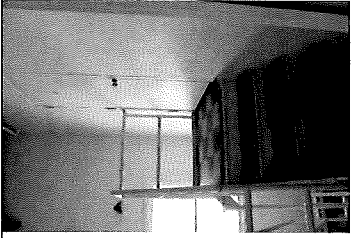
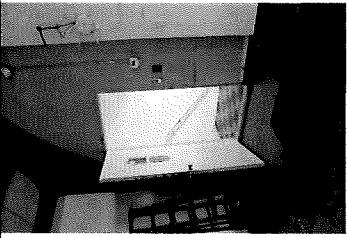
Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Bathroom			contact with pipes					
Time Clock	1 st /All	Protrudes >4"	Relocate or reinstall at 27" or lower, or 80" or higher from ground					
Board of Health	1 st	Bulletin Board & Fire extinguisher	Remove chairs that block accessible path and maneuvering space into Tax, Clerk & Assessor space. Re-affix flyers on bulletin board to 48" from floor; literature rack at 60" max (at center) from floor. Relocate or recess fire extinguisher that protrudes into hall to extend no >4"					
		Office Door width too narrow	Relocate meetings to accessible location (OR clear furniture behind door, install door w/32" clear opening and accessible hardware)					

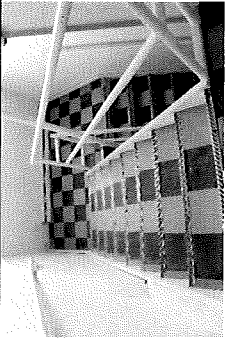

Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Tax Collector	1 st	Office door width too narrow (<29")	Relocate meetings to accessible location (OR install door w/32" clear opening and accessible hardware)					
Public Bulletin Board & Literature display (interior)	1 st	Public Bulletin Board blocked by office equipment; Literature display too high	Consider relocating Copier/Shredder/Recyc ling bins/chairs to other locations Lower display to 48" (60" on center)					


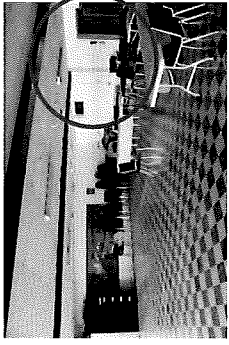
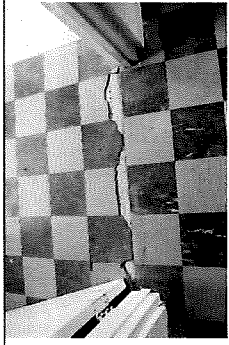
Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Hallway and Door	1 st	When door is open, maneuvering is tight	Consider removing door to front hall; Maintain 32" min. clear width thru door Hallway is compliant width					
Assessor & Town Clerk	1 st	Both Public counters are too high Aisle width	Modify counter to 36" max h. OR provide accessible table in each dept. (or shared by depts. in an accessible location) measuring 28" -34" above floor with clear floor space in front measuring 30" w x 48" long for forward approach Maintain min. 32" aisle width between file cabinets and desks					

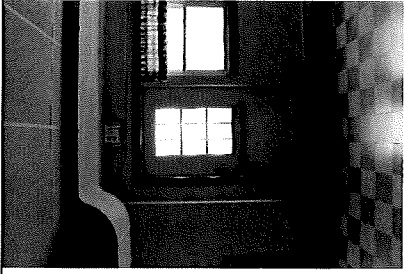
Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Admin Assistant & Town Administrat or	1st	Crowded offices cluttered aisles	Relocate any public meetings to accessible meeting space or reconfigure furniture layout/ space allocations; Relocate storage boxes to allow for 32" min clear width door opening					
Handrails on ramp	1st	Handrails end abruptly; blocked by shelving and fire extinguisher at top of ramp	Extend handrails on both sides to door of meeting room. At base of ramp, alter rails to extend 12" beyond top & bottom rails and round back at ends Relocate storage shelves and fire extinguisher blocking handrails and clear path					


Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Conference Room Door	1 st	Hardware non-compliant	Install compliant hardware and lock and door closer and consider adding automatic door opener					
Blocked Egress	1 st /All	Locked Door with "exit" sign	Remove/relocate exit sign; consider removing door completely or making entrance accessible					

Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Police Dept.	1 st	Interrogation Room not accessible	Relocate interrogation services to accessible space					
Stairwell Threshold	1 st	Threshold too high	Install bevel at threshold to even transition to stairwell – no > than 1/4" high					

Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Handrails in stairwell down to Community Center	1 st /all	Handrails should extend 12" beyond top and bottom of stair landing and return to wall or landing surface	Replace handrails with compliant type, both sides					
Conference Room & Community Room Access (continues on next pg)	1 st /All Ground	Inaccessible entrance Exterior signage	Remove unused entrance door and stairs OR Install ramp at exterior to Community Room level or, if site constraints prevent, install full size lift or LULA elevator Install signage indicating direction and path to Accessible entrances					

Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Community Room Lower Level Approach/ Parking lot	Lower Level/ All	Uneven / Degraded paving; no curb cuts, no striping no designated van accessible space, no access aisle, no safe travel routes delineated	Re-grade and pave; After repaving, paint striping for accessible spaces/ access aisles, safe routes into building Install Level solid surface under each portico					
Community Room Storage	Lower Level/ All	Storage Room	Install accessible hardware and lockset remove debris, reinstall shelving and lighting					
Kitchen and other areas	Lower level	Floor uneven	Replace missing or damaged floor tile throughout					

Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Two Community Room Entrance Doors	Lower Level	Doors hard to operate	Install door closers and compliant pull hardware/locks on each door; Install at least one electronic door opener adjacent to accessible parking spaces; Remove doormat and ensure floor at entry is level, with tile intact					
Entire Town Hall & Community Ctr building	All	Signage Door knobs	Install Brailled or hi- contrast Directional Signage 40" off ground throughout; Replace with ADA compliant hardware					
Entire Building	All	Fire Alarm devices	Upgrade fire alarm devices with flashing and audible signals; pull boxes mounted no higher than 48" to floor					See photo below

Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Lower Level and 1 st floor	All/vari ous	Storage boxes impeding clear routes of travel	Remove boxed items blocking routes and relocate to shared storage area or closet				N/A	

Peru Highway Department Transition Plan


Title II only requires listing physical obstacles, the methods suggested to make the facilities accessible, the schedule and the responsible official. Columns for cost estimates and potential funding sources are included for convenience.


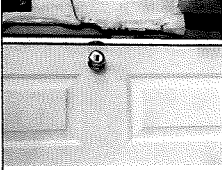
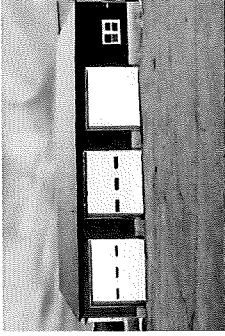
Facility PERU Highway/Transfer Station Date June, 2019

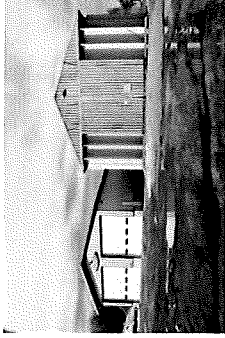
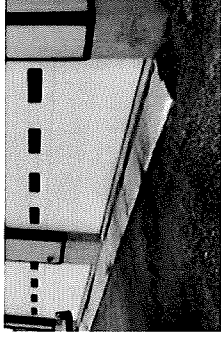
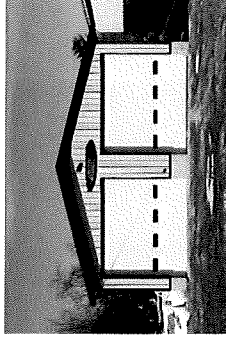
Contact Person Justin Russell, Highway Superintendent Department

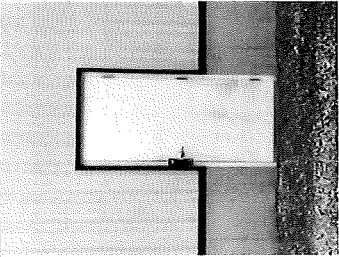
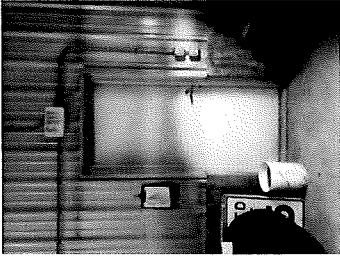
Email Town Administrator <townadmin@townofperuma.com> Phone 413-655-8312 x110

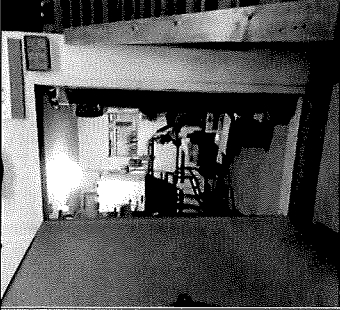
Approach & Entrance

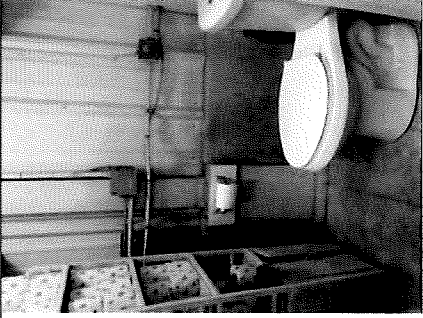
Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Building 1, Green Garage: Front entrance	Ground	Entrance Door	Main door must provide 32" clear width when fully open; install door closer Stored street signs and other materials must be removed to provide clear access routes		Hwy Supt.			

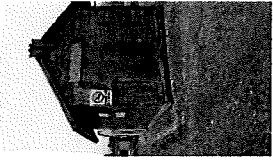
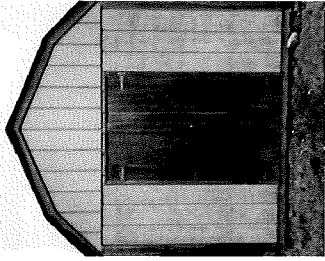
Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Building 1, Green Garage: Front Entrance – Parking Lot		Doorway threshold – too high	Bevel threshold to provide ¼" max hgt.					
		Door handle/knob	Door knob is not accessible; Install lever hardware (or add electronic door opener)					
		Accessible Parking Spaces: no curb cuts, no striping no designated van accessible space	Add handicap signage and designated space. Make sure spacing of signs allow for 8ft space with 5ft aisle.					
		Uneven / Degraded surface; no safe travel route	Re-grade and pave; After repaving, paint striping for accessible spaces/ safe routes into building					

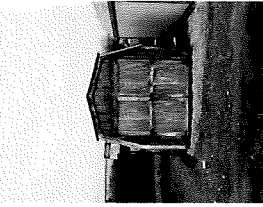
Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Building 2, Office Space & Bathroom: Front Parking Lot		Uneven / Degraded surface; no safe travel route	Re-grade and pave; After repaving, paint striping for accessible spaces/ safe routes into building					 <p>Threshold transition from gravel to cement uneven, too high</p> 
		Accessible Parking Spaces: no curb cuts, no striping no designated accessible space	Add handicap signage and designated parking space. Make sure spacing of signs allow for 8ft space with 5ft aisle.					

Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Building 2, Office		Doorway Threshold	Reduce height to 1/4 inch max or add bevel		Highway Supt.			
		Clear, Accessible Path	Remove Signs/stored items in path of travel		Highway Supt.			
		Door closer	Install door closer hardware		Highway Supt.			See above photo

Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Storage Closet/Electrical Room	1st	Accessible path/route in; Threshold	Reduce height to ¼ inch max or add ramp		Highway Supt.			
Staircase to Office	2nd	Staircase	Install accessible staircase 36" w min. with handrails on both sides that extend to 12" at top and bottom. Must be able to support up to 200 lbs. Alternatively, install lift to 2nd level or REMOVE staircase		Highway Supt			See above photo, right
Bathroom		Room dimensions	Expand or alter to attain a room 48" wide min. from side wall and 56" depth to rear wall; remove shelving to attain same		Highway Supt			See below

Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
		Accessible route	Threshold should be no higher than ¼ inch from adjacent floor					
		Fixture	Replace toilet fixture with one w/ flush control on accessible side					
		Door & Hardware	Install Door to attain 32" min width with lever hardware and door closer					
		Grab Bars, door hook, paper towel dispenser	Install side and rear grab bars, 1 coat hook and paper towel dispenser					
		Paper Dispenser	Reinstall dispenser no less than 7" and no greater than 9 inches from front of toilet fixture		Highway Supt			

Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Outside Shed 1:		Vertical threshold to enter	Add ramp or bevel; reduce height to ½ inch max.		Highway Supt			
Outside Shed 2:		Vertical threshold to enter	Add ramp or bevel; reduce height to ½ inch max.		Highway Supt			
		Door pull	Add door pull or slide bolt type-lock; mounted from 34"-48" from grnd		Highway Supt			

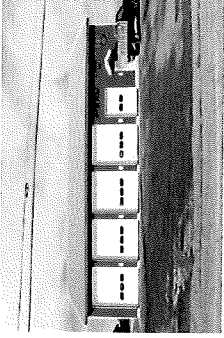
Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Outside Shed 3: storage space		Vertical threshold to enter	Add ramp or bevel; reduce height to ¼ inch max.		Highway Supt			
		Door handle/knob	Add door pull or slide bolt type-lock mounted from 34"-48" from grnd		Highway Supt			



Peru Volunteer Fire Department Transition Plan


Title II of the ADA only requires listing physical obstacles, the methods suggested to make the facilities accessible, the schedule and the responsible official. Columns for cost estimates and potential funding sources are added for greater utility and convenience.

Facility PERU Volunteer Fire Department Date June, 2019
 Contact Person Chief Brian Dewkett Department Fire Department
 Email pvd2@verizon.net Phone (413) 655-8811

Approach & Entrance

Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Parking Lot - Accessible Parking Spaces (Front Entrance)	Ground /All	Uneven / Degraded surface; no curb cuts, no striping no designated accessible parking space, no safe travel route into building	Re-grade and pave; Paint striping for accessible spaces/ safe routes into building Reinstall handicap sign at designated spaces. Make sure spacing of signs allow for 8ft space with 5ft aisle.		Fire Dept.	\$	E.g. Capital budget; Community Compact ADA grant; MA DOT Complete Streets program	
Front Entrance Door	Ground /All	Front Door closer	Adjust door closer to full 5 seconds (w/door at 90 degrees);		Fire Dept.	0	n/a	

Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Front Entrance – Threshold	Ground	Gap between ground and door threshold	Fill gap at threshold to no more than ¼"					
Front Accessible Entrance Sign	1 st / All depts.	Accessible Entrance Sign	Add sign at 60" off ground					
Back parking lot (shared with Town)	Ground /All	Uneven / Degraded surface; no curb cuts; no striping no designated van accessible space, no safe travel route	Re-grade and pave; After repaving, paint striping for accessible spaces/ safe routes into building Add signage and designated spots; 1 should be van accessible. Make sure spacing of signs allow for 8ft space with 5ft aisle.		Fire Dept and Town Select Board and Recreation Committee			

Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Entire Building	Ground	Signage	Install Dept. & Room Directional Signage 40" off ground throughout					
Stairway to storage	Ground	Accessible route & handrails	If keeping stairs, re-install at 36" width minimum; install compliant handrails on both sides. Handrail must extend 12" onto horizontal surface at top and bottom; must be able to hold 200 lbs; Alternatively, install a lift or hoist up to storage area.					
Entire Building	Ground	Walk and passage ways	Keep passage routes inside building free of clutter or stored items			n/a		

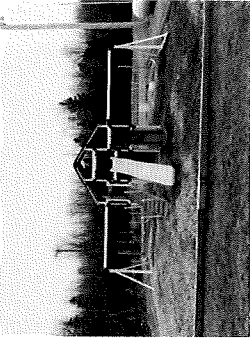
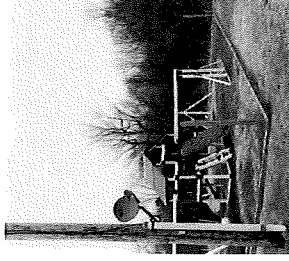
Peru Ballfield, Playground and Cemeteries Transition Plan

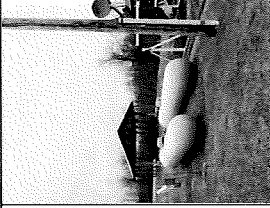
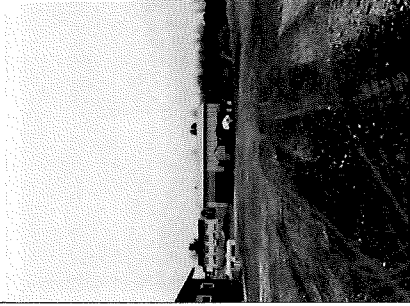
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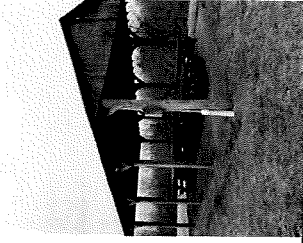

Facility PERU Ballfield / Playground / Cemeteries Date June, 2019

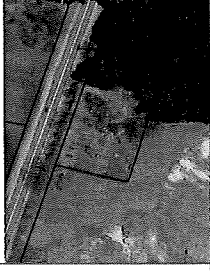

Contact Person George Greule Department Recreation Committee 413 655-8688
Contact Person Darryl Darby Department Cemetery Sextion 413-655-8524

Approach & Entrance

Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Playground	Ground	No curb cut/no access path into playground area (from parking lot) Uneven playing surface	Create a 36" wide (min.) path from parking lot Create 36" w. (min.) opening in railroad tie border into playground Regrade and rake play surface and refresh surface with loose fill when needed.		Recreation Committee & Board of Selectmen			 

Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Playground	Ground	Propane storage tanks	Fence eastern side of playground to restrict access to propane storage tanks		Recreation Committee			 Propane tanks adjacent to playground
Driveway & Parking Lot adjacent to Playground, Pavilion and Ballfield (Shared with Volunteer Fire Dept.)	Ground	Uneven / Degraded paved surface; no curb cuts, no striping no designated van accessible space(s), no safe travel route.	Re-grade to 1:48 max slope. Repave (or consider permeable gravel surface system.) Add striping delineating accessible spaces/ access aisle and route into both play areas and adjacent pavilion Add ADA compliant signage 1 should be van accessible. Make sure spacing of signs allow for 8 ft. space with 5 ft. access aisle.		Select Board, Recreation Committee and Fire Dept.			 Shared Parking Lot behind FD, Playground, Ballfield and Pavilion access (looking east toward Hwy Dept.)

Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
Pavilion	Ground	No accessible routes to Pavilion from parking lot	Create level, smooth surface 36" wide min. from parking lot to pavilion		Select Board, Recreation Committee; Fire Dept. (?)			 Picnic Pavilion
Ballfield	Ground	No accessible routes to playing field from parking lot	Create level, smooth surface 36" wide min. from parking lot to ballfield		Select Board, Recreation Committee			
Ballfield	Ground	Uneven Playing surface	Re-grade to 1:48 max slope		Select Board, Recreation Committee			See above

Location	Floor/ Dept.	Element	Solution	Target Date	Person Responsible	Cost Estimate	Potential Source of Funds	Photos
North Cemetery	Ground	Access driveway	Regrade to remove ruts and level; Apply and pack gravel to even surface		Darryl Darby Cemetery Sexton		Town Budget	
South Cemetery	Ground	Access driveway	Regrade to remove ruts and level; Apply and pack gravel to even surface		Darryl Darby Cemetery Sexton		Town Budget	
Center Cemetery	Ground	Access driveway	Regrade to remove ruts and level; Apply and pack gravel to even surface		Darryl Darby Cemetery Sexton		Town Budget	